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October 8, 2021

VIA E-FILING

The Honorable Leonard P. Stark
U.S. District Court for the District of Delaware
844 North King Street
Wilmington, Delaware 19801

**Re: *Crystallex International Corporation v. Bolivarian Republic of Venezuela et al.*,
C.A. No. 17-mc-151-LPS**

Dear Judge Stark:

We write to clarify one point with respect to the budgeting process in response to the Special Master's letter to the Court dated September 29, 2021 (D.I. 370). We will not burden the Court with a detailed explanation of our somewhat different view of the parties' discussions.

Specifically, ConocoPhillips did *not* request that a cap be imposed on particular categories of work to which the firms would be held accountable when their fees are reviewed for reasonableness. The Court has made clear that it does not think it appropriate to hold the Special Master to fee caps. Instead, ConocoPhillips' view, as expressed to the Special Master and his advisors, is that the budget procedures would be more useful if they provide a breakdown of the estimated costs of the activities the Special Master intends to engage in and to which he will devote the Sale Process Parties' resources, rather than merely providing a bottom line number for each firm.

ConocoPhillips appreciates the Court's time and attention to this matter.

Respectfully submitted,

/s/ Garrett B. Moritz

Garrett B. Moritz (#5646)

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cc: All Counsel of Record
Robert Pincus, Special Master